

**SEPT 1998**

D-5010

MEMORANDUM

To: Office of Inspector General  
Acting Assistant Inspector General for Audits

From: Eluid L. Martinez **SGD ELUID L MARTINEZ**  
Commissioner

Subject: Comments on the Draft Evaluation Report on Year 2000 Readiness of Automated Information Systems (Assignment No. A-IN-BOR-001-98R)

Attached are comments on the Draft Evaluation Report on Year 2000 Readiness of Automated Information Systems (Assignment No. A-IN-BOR-001-98R) at the Bureau of Reclamation. We appreciate the opportunity to review and comment on the draft report.

The report reflects a nontechnical review of Year 2000 (Y2K) readiness within Reclamation and the status of the Y2K project in light of Office of Management and Budget and Department of the Interior required guidelines and the six criteria requested for evaluation by the Department's Chief Information Officer. Discussions between our staffs during the preliminary draft review period resulted in many requested corrections which are reflected in the referenced draft. However, we believe several general comments in the report are unsupported opinions of Reclamation operations. Our response reflects only a few of the items of concern from the draft report. Reclamation will continue to focus on Y2K project issues and meet every deadline imposed by the Department and OMB

We appreciate the difficulty of reporting on such a complex subject. We hope you will find the attached comments to be of assistance, and we will be pleased to provide further information or clarification on any of the comments provided.

Attachment

cc: Assistant Secretary - Water and Science, Attention.- Carla Burzyk  
(w/attachment)

bc: W-1000, W-1100, W-1500, W-6000, W-6010, W-5000 (Moore)  
D-5000, D-5010 (Maez), D-5400  
D-1000, D-2000, D-7000, D-71 10 (Rosenlof, Feuerstein), D-7400 (Breshears  
(w/attachment to each)

WBR:KRosenlof 303/445-3316:efg:9/9/98 P:/current/5010/maez/oig/perni/y2K.i98

**Bureau of Reclamation**  
Comments on OIG Draft Evaluation Report  
Year 2000 Readiness of Automated Information Systems  
Assignment No. A-IN-BOR- I 10-98R)

**General Comments**

**Results of Evaluation**

All known systems were reported in the comprehensive plan sent to the Department of the Interior (DOI) June 1, 1997. Estimated completion dates have proven accurate with less than 5 percent error. For many years Reclamation has had complex Continuity of Operations Plans for all of our facilities. The draft implied these Plans did not address all of the specific and widespread contingencies that could occur as a result of the Y2K problem even though each facility is prepared for any potential disaster, including Y2K calamities. Reclamation is currently in the process of developing a "Y2K Contingency Planning and Management Guide for Power and Water Facilities" which should cover any anticipated shortfalls.

**Automated Information Systems Inventory**

At the time of the inventory, no definition for mission-critical systems was available from DOI Reclamation used a combination of definitions from the Department of the Air Force Y2K's criteria with a semblance of the actual mission of our Bureau. Reclamation did initially report more mission-critical systems in an attempt to fully recognize all Y2K issues. However, as a result of discussions with, and as directed by the Office of Information Resources Management (OIRM), Reclamation reduced to 16 the number of mission-critical systems that were to be repaired. Based on this guidance, and as a result of guidance from OIRM, Reclamation did not report mission-critical applications that were not Y2K compliant and were scheduled to be retired or replaced.

Reclamation does, however, recognize the concern expressed by the OIG with respect to ensuring that all mission-critical applications are addressed. In fact, we are cognizant of the need to ensure that these applications will continue to function after January 1, 2000, and are providing high-level, ongoing management attention to ensure that all mission-critical applications will be Y2K compliant in sufficient time prior to January 2000.

**Contingency Planning**

Reference was made that nowhere in the facilities Continuity of Operations Plans was any consideration made in the event that cellular phones, telephones, radios, and automobiles may fall due to Y2K noncompliance. Reclamation cannot be held responsible for global and common possibilities Outside our scope or ability to control. However, it is the nature of our workforce to be at the work site or be readily available to transit to the work site at a moment's notice.

**Auditable Cost Estimates**

The OIG stated that it did not expect consistent and auditable cost estimates at this point but rather, Reclamation should keep track of Y2K expenses from this point forward.

## Specific Comments

1. Page 2. leading, paragraph- third sentence : Should read March 1, 1999. This is the artificially mandated due date for implementation of all Y2K software applications. All systems with the exception of the Mid-Pacific's CVACS **will** be Y2K compliant and implemented by March 1, 1999.
2. Page 6. paragraphs 1 and-2: Since no "special" funding was or is available for Y2K efforts, Y2K costs were and are still taken out of operations and project funds as they currently exist in each office. In most instances there have been no means to track Y2K costs
3. Page 6. paragraph 2. sentence 5: The actual cost to upgrade the terminal emulator package in EM340 was \$500, **and the actual cost** to complete the HYDROSS application renovation, including testing and implementation, was \$5,680
4. Page 7. paragraph 2: We concur that not all Y2K involved personnel had Y2K performance elements in their annual performance plans, including appropriate Reclamation executives. Since then, further direction has been disseminated from the Commissioner's office to assure the Y2K mission-critical element has been or will soon be added to all Y2K responsible personnel.
5. Page 8. paragraph 2 under "Contingency Plans": The actual number of noncompliant SCADA systems within Reclamation was two, compared to the numerous SCADA systems found throughout Reclamation. It is believed that ten powerplant operators would more than cover these two SCADA sites. Most operations managers do not expect a need for additional help, since most feel they are already adequately staffed for such an emergency. The original request was Reclamation-wide in nature to cover unforeseen contingencies that may be outside our control.
6. Page 9. paragraph 5: Reclamation had received no IV&V plan guidance from either DOI or OMB at the time of the audit. However, OMB instructions specifying third party tests and directions have been given to all Y2K involved personnel and offices throughout Reclamation.
7. Page 9. paragraph 6- compliance reporting: The Y2K compliant SCADA system has been implemented at the Wyoming Area Office and is still running. The system did, however, show non-fatal errors relating to the four-digit year just introduced. These have since been repaired.